

COOLEY LLP  
BOBBY GHAJAR (198719)  
(bghajar@cooley.com)  
1333 2nd Street, Suite 400  
Santa Monica, CA 90401  
Telephone: (310) 883-6400

KATHLEEN HARTNETT (314267)  
(khartnett@cooley.com)  
MARK WEINSTEIN (193043)  
(mweinstein@cooley.com)  
3175 Hanover Street  
Palo Alto, CA 94304  
Telephone: (650) 843-5000

CLEARY GOTTlieb STEEN & HAMILTON LLP  
ANGELA L. DUNNING (212047)  
(adunning@cgsh.com)  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304  
Telephone: (650) 815-4131

DUNN ISAACSON RHEE LLP  
KAREN L. DUNN (*pro hac vice*)  
(kdunn@dirllp.com)  
KYLE N. SMITH (*pro hac vice*)  
(ksmith@dirllp.com)  
401 9th Street, NW  
Washington, DC 20004  
Telephone: (202) 240-2900

*[Full Listing on Signature Page]*  
*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
corporation;

Defendant.

Case No. 3:23-cv-03417-VC

**[PROPOSED] ORDER DENYING PLAINTIFFS'  
ADMINISTRATIVE MOTION REQUESTING  
LEAVE TO OBTAIN LIMITED ADDITIONAL  
DISCOVERY**

Plaintiffs filed an Administrative Motion Requesting to Obtain Limited Additional Discovery, per Civil L.R. 7-11.

Having considered the Administrative Motion, the Court **ORDERS** as follows:

Plaintiffs may depose Ms. Wang for no more than four hours, limited to her torrenting-related activities in 2024. Plaintiffs' Motion is otherwise **DENIED**.

**IT IS HEREBY ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HON. VINCE CHHABRIA  
UNITED STATES DISTRICT JUDGE